

August 26, 2024

Via ECF

The Honorable Katherine Polk Failla
 United States District Judge
 Southern District of New York
 40 Foley Square, Room 2103
 New York, New York 10004

MEMO ENDORSED

Re: *Whelan, Jr. et al. v. Gerson Lehrman Group, Inc.*
Docket No. 1:24-cv-2202-KPF
GRSM File No.: 1348295

Dear Judge Failla:

As Your Honor is aware, this firm represents the interests of Plaintiffs in the above-referenced matter. We write jointly with Defendant's counsel and pursuant to Section 2(C)(i) of Your Honor's Individual Rules of Practice in Civil Cases to (a) respectfully request an adjournment of the initial pretrial conference presently scheduled for August 27, 2024, and (b) request an additional thirty-day extension of time to file the consolidated amended complaint in this matter.

On July 30, 2024, Your Honor entered an order extending the time for Plaintiffs to file the consolidated amended complaint up to and including August 28, 2024, and for Defendant to answer, move or otherwise respond to same up to and including October 16, 2024. Dkt. 21.

Accordingly, the Parties respectfully request that Your Honor (a) adjourn the initial pretrial conference until a date after Defendant's eventual answer deadline (*see* Dkt. 17) that is convenient for the Court, and (b) extend Plaintiffs' deadline to file the consolidated amended complaint to allow the Parties to continue to explore the potential for early resolution. Specifically, Plaintiffs seek an additional thirty-day extension of time to file the consolidated amended complaint to Friday, September 27, 2024, and Defendant's deadline to answer, move, or otherwise respond to the consolidated amended complaint to be extended to Friday, November 15, 2024.

This is the Parties' first request for an adjournment of the initial pretrial conference, though Your Honor previously adjourned same (*see* Dkt. 17). It is also the third request for an extension of Plaintiffs' consolidated amended complaint deadline and Defendant's corresponding response deadline. As indicated above, Defendant's counsel consents to and joins in this request.

We thank Your Honor in advance for the Court's consideration of this request. Should Your Honor have any questions or require additional information, please do not hesitate to contact the undersigned.

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Respectfully Submitted,

SIRI & GLIMSTAD

/s/ Mason A. Barney
Mason A. Barney

CC: All counsel of record via ECF

Application GRANTED. Plaintiffs shall file their consolidated amended complaint on or before **September 27, 2024**. Defendant shall answer, move, or otherwise respond to the consolidated amended complaint on or before **November 15, 2024**.

The initial pre-trial conference scheduled for August 27, 2024, is hereby ADJOURNED to **November 26, 2024**, at **11:00 a.m.** The conference will be telephonic, and the dial-in information is as follows: At the designated time, the parties shall call (888) 363-4749, and use access code 5123533.

The Clerk of Court is directed to terminate the pending motion at docket entry 18.

Date: August 27, 2024 SO ORDERED.
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE